

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

Judgment Creditor,

v.

GLENN GRIFFIN,

Judgment Debtor.

**USDC SDNY**  
**DOCUMENT**  
**ELECTRONICALLY FILED**  
DOC #:  
DATE FILED: 7/17/25

22-CR-0390-01 (VB)

**STIPULATION AND ORDER  
TO STAY EXECUTION OF  
MONETARY PENALTIES  
PENDING APPEAL**

WHEREAS the Court entered judgment against Glenn Griffin on June 11, 2025, which imposed the following criminal monetary penalties: \$200 special assessment, \$50,000 fine, \$220,000 forfeiture, and \$2,400,000 restitution, totaling \$2,670,200;

WHEREAS post-judgment interest accrues on the unpaid fine and restitution at the rate of 4.09% pursuant to 18 U.S.C. § 3612(f), while no interest accrues on the assessment and forfeiture amounts imposed;

WHEREAS Griffin has filed or intends to file a notice of appeal his conviction and sentence, including the criminal monetary penalties imposed;

WHEREAS, pursuant to Federal Rules of Criminal Procedure 32.2(d) and 38(c), (e), the United States of America ("the Government") has demanded that Griffin post an appeal bond or deposit funds into the court registry and with the United States Marshal for a stay of execution of the criminal monetary penalties imposed by the judgment pending appeal;

WHEREAS the Government and Griffin have agreed to stay execution of the criminal monetary penalties on the following terms;

IT IS HEREBY STIPULATED AND AGREED, by and between the Government, through Jay Clayton, United States Attorney for the Southern District of New York, and Griffin, through his attorneys, Windels Marx Lane & Mittendorf, LLP, that:

1. Griffin shall, within 35 days of the signed execution of this agreement, make the following payments to stay execution of the judgment:

a. Payment of \$2,450,000 to the Clerk of Court to cover the special assessment, fine, and restitution; and

b. Payment of \$220,000 to the United States Marshal's Service to cover the forfeiture money judgment.

2. Upon proof of payment, the Government's execution of each criminal monetary penalty is stayed until the conclusion of the appeal and all proceedings on remand, if any, such that the Government shall refrain from taking steps to enforce the judgment debts due to the funds deposited by Griffin.

3. The Government is granted and shall maintain a first lien on the deposited funds superior to any other, in addition to the lien already in existence, and effective since the date of judgment pursuant to 18 U.S.C. 3613(c) (fine and restitution) and 21 U.S.C. § 853(c) (forfeiture).

4. The Clerk of Court shall deposit and hold the funds in an interest-bearing account, pursuant to 28 U.S.C. §§ 2041, 2045, until the conclusion of the appeal and all proceedings on remand, if any. The United States Marshal's Service shall deposit and hold the funds in the Seized Asset Deposit Fund pending further disposition, pursuant to 21 U.S.C. § 853(h).

5. In the event that the judgment is affirmed, in whole or in part, the Clerk of Court and the United States Marshal's Service shall apply the deposited funds to the criminal monetary penalties in accordance with the appellate decision and 28 U.S.C. § 2042 or 21 U.S.C. § 853(p). However, should Griffin or the Government seek a rehearing by the Second Circuit or the Supreme Court,

the deposited funds will remain in the court's registry and with the United States Marshal's Service, and the *status quo* shall be maintained, until the exhaustion of the appeal.

6. This Stipulation and Order may be executed in counterparts, which, when taken together, shall constitute one agreement with the same force and effect as if all signatures had been entered contemporaneously.

7. This Stipulation contains the entire agreement between the Government and Griffin about the criminal monetary penalties in the above-captioned case.

8. Each party shall bear its own legal fees and other costs incurred in this matter.

9. The district court shall retain jurisdiction to enforce this Stipulation and Order, and to amend it as necessary, pursuant to 28 U.S.C. § 1651 and Fed. R. Crim. P. 32.2 and 38.

ACCEPTED AND AGREED TO IN ALL RESPECTS:

JAY CLAYTON  
United States Attorney for the  
Southern District of New York

/s/ Melissa A. Childs  
MELISSA A. CHILDS  
DAVID R. FELTON  
JAMES F. McMAHON  
Assistant United States Attorneys  
86 Chambers Street, 3rd Floor  
New York, NY 10007  
*Attorney for United States of America*  
Date: July 16, 2025

/s/ Jeffrey C. Hoffman (agreed by email)  
JEFFREY C. HOFFMAN, ESQ.  
GABRIEL ALTMAN, ESQ.  
MARKY A. SUAZO, ESQ.  
Windels Marx Lane & Mittendorf, LLP  
156 West 56th Street  
New York, New York 10019  
*Attorney for Glenn Griffin*  
Date: July 16, 2025

\_\_\_\_\_  
GLENN GRIFFIN  
*Judgment Debtor*  
Date: \_\_\_\_\_

SO ORDERED:

\_\_\_\_\_  
UNITED STATES DISTRICT JUDGE

JAY CLAYTON

United States Attorney for the  
Southern District of New York

MELISSA A. CHILDS

DAVID R. FELTON

JAMES F. McMahon

Assistant United States Attorneys

86 Chambers Street, 3rd Floor

New York, NY 10007

Attorney for United States of America

Date: \_\_\_\_\_

JEFFREY C. HOFFMAN, ESQ.

GABRIEL ALTMAN, ESQ.

MARKY A. SUAZON, ESQ.

Windels Marx Lane & Mittendorf, LLP

156 West 56th Street

New York, New York 10019

Attorney for Glenn Griffin


Date: 7-10-25

  
\_\_\_\_\_  
GLENN GRIFFIN

Judgment Debtor

Date: \_\_\_\_\_

SO ORDERED:

  
\_\_\_\_\_  
UNITED STATES DISTRICT JUDGE

July 17, 2025